



January 28, 2004

Ms. Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Response of Fitchburg Gas and Electric Light Company to
Request for Detailed Plan to Eliminate Backlog of Double Poles
D.T.E. 03-87

Dear Secretary Cottrell:

Fitchburg Gas and Electric Light Company ("FG&E") is pleased to submit the following response to the Department of Telecommunications and Energy's ("Department") Report, issued in D.T.E. 03-87 on November 28, 2003, which required that all utility pole owners submit detailed plans for eliminating the backlog of double utility poles within their respective service areas. Enclosed for filing are the original and six (6) copies of this response. Please date-stamp one copy and return in the enclosed self-addressed stamped envelop.

Current Double Pole Inventory

As detailed in FG&E's filing in this docket on October 14, 2003, out of a total of approximately 18,500 utility poles, as of that date there were a total of 343 double poles in place in four towns served by FG&E:

Ashby:	78
Fitchburg:	153
Lunenburg:	32
Townsend:	80

During the period from October 14, 2003 through January 28, 2004, 50 double poles were removed and 27 new double poles were added, resulting in a current total of 320 double poles:

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Senior Regulatory Counsel

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Ashby: 56
Fitchburg: 153
Lunenburg: 24
Townsend: 87

A more complete breakdown of the status of the double poles, showing which transfers are pending, is attached to this letter.

FG&E Workplan

FG&E recognizes that any plan to address the double pole issue must attempt to reduce the current backlog as well as avoid the accumulation of any new backlog. FG&E has undertaken a concerted effort to respond by adding all new double pole work to our schedule as soon as we become the designated "ball-in-court" owner or transferor. Work orders are prepared to accomplish either the transfer work or the pole butt removal. Generally, FG&E plans to attend to such work orders within a 30 day time frame unless weather conditions or system emergencies preclude such efforts.

FG&E has also begun adding all backlogged poles which are our responsibility into the work schedule. On those poles where we are the designated "ball-in-court" owner, we have worked the backlog down to a relatively small number: where all of the transfers have been completed, a total of nine (9) poles are pending removal in FG&E's maintenance area; a total of 23 poles are at the stage of awaiting the transfer of the electric service lines.

Joint Owners and Licensees

Prior to the introduction of the on-line Pole Lifecycle Management System ("PLM") system, arranging for the cable company to transfer its facilities from the pole used to be a source of significant delay. Since the PLM system has been employed, however, the cable companies in FG&E's service area have attended to their transfer responsibilities in a timely fashion.

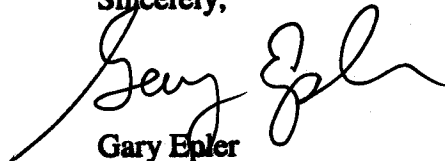
The largest remaining issue in attempting to eliminate the double pole backlog is between FG&E and Verizon, as joint owners of the pole inventory. The Joint Ownership Agreement between the two companies, and the Memorandum of Procedure detailing Intercompany Operating Procedures, both dated November 1, 1996, provide a framework and remedies for the joint

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owners to address this issue. FG&E is in the process of contacting Verizon in order to discuss this, and to attempt to verify the data concerning the number and location of the double poles, clarify responsibility for transfers or removal, and establish a work schedule.

Based upon the foregoing plan and the work accomplished to date, FG&E believes that it will be able to successfully address the concerns regarding double utility poles discussed in the Department's Report. Please do not hesitate to contact me if you have any questions or concerns regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Epler", with a long, sweeping horizontal line extending from the left side of the signature.

Gary Epler
Senior Regulatory Counsel

Attachment

cc: William Stevens, Hearing Officer
All parties on Department Service List

Status of Double Utility Poles in FG&E Service Area – January 28, 2004¹

Town	Double Poles Removed	Electric Transfers Remaining	Cable Transfers Remaining	Fire Transfers Remaining	Phone Transfers Remaining	Transfer Complete Removal Pending VZ Area	New Double Poles
Ashby	22 by FG&E	1	0	0	53	0	0
Fitchburg	5 by FG&E 11 by Verizon	9	9	4	80	45	16
Lunenburg	11 by Verizon	3	14	0	5	2	3
Townsend	1 by Verizon	10	21	4	43	8	8
Town	Total as of 10-14-03	Poles Removed	Poles Added	Total as of 01-28-04			
Ashby	78	22	0	56			
Fitchburg	153	16	16	153			
Lunenburg	32	11	3	24			
Townsend	80	1	8	87			

¹ The listings for "Double Poles Removed" and "New Double Poles" are since October 14, 2003. All data in this chart is based upon information in the PLM system and company records, and is subject to correction and update as documentation, work orders and field reports are reviewed.